

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

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7 IN RE:

8 NATIONAL PRESCRIPTION OPIATE MDL NO. 2804
LITIGATION

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 This document relates to: Case No. 17-MD-2804

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 All cases Hon. Dan A. Polster

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13 HIGHLY CONFIDENTIAL - SUBJECT TO
14 FURTHER CONFIDENTIALITY REVIEW

15 VIDEOTAPED DEPOSITION OF:

16 STEVE REARDON

17 ALOFT BOSTON SEAPORT

18 401-403 D Street

19 Boston, Massachusetts

20 November 30, 2018 9:03 a.m.

21

22 Darlene M. Coppola

23 Registered Merit Reporter

24 Certified Realtime Reporter

1 hydrochloride limit, those numbers are changing,
2 right --

3 A. Yes.

4 Q. -- at least according to the PowerPoint,
5 correct?

6 A. Yes.

7 Q. Okay. But the fact that you have a
8 limiter that's a multiple of the average and then
9 you have customers exceeding it by 200 percent,
10 that doesn't cause you some concern as a
11 regulator --

12 MR. PYSER: Object to form.

13 BY MR. FULLER:

14 Q. -- at least, hey, why are we exceeding it
15 by 200 percent, right?

16 MR. PYSER: Object to form.

17 A. Makes sense.

18 BY MR. FULLER:

19 Q. And certainly, like you mentioned earlier,
20 you can go do some due diligence, but you would
21 want to see that due diligence documented to
22 justify why we're still shipping such an excessive
23 number to these particularly this pharmacy,
24 correct?

1 A. Correct.

2 Q. Okay. So let's go to the next one.

3 Overholt's Champion Pharmacy in Warren. I'll tell
4 you Warren is just outside of Cuyahoga and Summit
5 County. It's not in Cuyahoga and Summit County,
6 but this pharmacy -- again, we see the same
7 limiters because we're dealing with the same
8 months, and then we see the number of opium that
9 they've ordered, correct?

10 A. Yes.

11 MR. PYSER: Object to form.

12 BY MR. FULLER:

13 Q. 855, 930, 769. Then let's go to the next
14 column, which is 635 percent for the first one in
15 July. The next one is 528 percent, and then 363
16 percent, over the multiplied average.

17 Let's go to the final one. This one, New
18 Choice Pharmacy, Cuyahoga Falls. This is in
19 Summit County, okay. Again, we see the same
20 limiter amounts because we're looking at the same
21 months, 786, 1,089, 1,254. And the percentage
22 overages are 576 for the first one in July, then
23 in October we're at 635 percent, then finally 655
24 percent in December.